



RONI was released from serving any term of imprisonment related to that offense within 15 years of the commencement of each of the instant offenses charged in this Indictment.

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances,  
21 U.S.C. §§ 846)

The Grand Jury charges:

2. Beginning on or about January, 2019, and continuing through on or about May, 2022 in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants MARC MAHONEY, aka BEAR, aka MOOKIE; HOSEA LOCK; JESSE BOJORQUEZ; JEROME MCGINNIS, aka +RONI; MARQUIS GLENN, aka POLO; DESMOND SMITH, aka DEZ; DESHON KNOWLES, and SAMMY ABRAHAM did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others known and unknown to the Grand Jury, to distribute and possess with intent to distribute 5,000 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

MANNER AND MEANS OF THE CONSPIRACY

3. It was part of the conspiracy that:
- A. MAHONEY obtained kilogram quantities of cocaine from sources of supply in Mexico.
  - B. MAHONEY redistributed cocaine to LOCK, MCGINNIS, GLENN, SMITH, and others in Cleveland and elsewhere in the Northern District of Ohio for further redistribution.

- C. SMITH redistributed cocaine obtained from MAHONEY to KNOWLES and ABRAHAM in Cleveland and elsewhere in the Northern District of Ohio for further redistribution.
- D. MAHONEY documented the cocaine kilogram sales and cocaine sales proceeds transactions with his customers in a hand-written ledger.
- E. MAHONEY purchased properties in Conneaut, Ohio to conceal the nature of his cocaine sales proceeds.
- F. SMITH carried firearms to protect himself, his drugs, and his drug proceeds.
- G. Conspirators used multiple telephones to conduct drug trafficking activity by making and receiving telephone calls and sending and receiving text messages and iMessages to communicate. Conspirators used coded/slang terminology to obscure and disguise the true nature of their activities and the true meaning of their conversations.

#### ACTS IN FURTHERANCE OF THE CONSPIRACY

4. In furtherance thereof, and to effect and conceal the existence of the conspiracy, the defendants and others performed acts in the Northern District of Ohio, and elsewhere, including but not limited to the following:

- 5. Between on or about January 2019, to on or about January 2022, MAHONEY distributed approximately 160 kilograms of cocaine to GLENN.
- 6. Between on or about January 2019, to on or about January 20, 2022, GLENN paid MAHONEY approximately \$4,964,500 in cocaine sales proceeds.
- 7. Between on or about January 2019, to on or about January 2022, MAHONEY recorded each cocaine and proceeds transaction with GLENN in a hand-written ledger.

8. Between on or about January 2019, to on or about January 20, 2022, MAHONEY distributed approximately 295 kilograms of cocaine to LOCK.

9. Between on or about January 2019, to on or about January 20, 2022, LOCK paid MAHONEY approximately \$9,343,670.00 in cocaine sales proceeds.

10. Between on or about January 2019, to on or about January 20, 2022, MAHONEY recorded each cocaine and proceeds transaction with LOCK in a hand-written ledger.

11. Between on or about January 2019, to on or about January 20, 2022, MAHONEY distributed approximately 88 kilograms of cocaine to MCGINNIS.

12. Between on or about May 2019, to on or about January, 2022, MCGINNIS paid MAHONEY approximately \$3,150,340.00 in cocaine sales proceeds.

13. Between on or about May 2019, to on or about January, 2022, MAHONEY recorded each cocaine and proceeds transaction with MCGINNIS in a hand-written ledger.

14. Between on or about April 26, 2021, to on or about September, 2021, MAHONEY distributed approximately 68 kilograms of cocaine to SMITH.

15. Between on or about April 26, 2021, to on or about September, 2021, SMITH paid MAHONEY approximately \$2,392,000.00 in cocaine sales proceeds.

16. Between on or about April 26, 2021, to on or about September, 2021, MAHONEY recorded each cocaine and proceeds transaction with SMITH in a hand-written ledger.

17. On or about September 15, 2020, between approximately 2:46 a.m. and 3:21 p.m., MAHONEY and LOCK engaged in an iMessage exchange via telephone regarding the price per kilogram in the Cleveland, Ohio area. LOCK stated, "45" and "40 to 45" and "Tell them (MAHONEY's cocaine suppliers) to give us a price we all in." LOCK continued, "We don't want to miss" and "What ever ticket (price) they give us," and, "I made some calls from 40 to 50

(\$40,000.00 to \$50,000.00 per kilogram).” MAHONEY replied, “Ok got it ‘thumbs up’ emoji.” LOCK stated, “Let me know I’m waiting,” and “Do what you need to do to get it (kilograms of cocaine) to us we have to eat (need resupply) to bro we going to make it right just keep it reasonable (keep the price per kilogram of cocaine reasonable).” MAHONEY replied, “Working on it” and “Thank you!” LOCK stated, “You know I got your back.”

18. On or about July 15, 2021, MAHONEY purchased 247 Main Street, Conneaut, OH 44030 from R&E Growth Properties Ltd. for a listed price of \$30,000.00, with cocaine sales proceeds.

19. On or about July 18, 2021, between approximately 10:03 p.m. and 10:11 p.m. SMITH and MAHONEY engaged in an iMessage exchange on the telephone to arrange a cocaine and/or cocaine sales proceeds transaction at SMITH’s residence at 1XXX Weymouth Circle, Westlake, Ohio. SMITH stated, “How far (away is MAHONEY?).” MAHONEY replied, “Couple min.” MAHONEY then said, “Here (1XXX Weymouth Circle, Westlake, Ohio).” SMITH replied, “Ok.”

20. On or about July 19, 2021, between approximately 8:52 a.m. and 11:20 a.m., MAHONEY and SMITH engaged in an iMessage conversation on the telephone. MAHONEY said, “Only 89 (\$89,000.00) here.” SMITH replied, “Ok,” then, “Put the other one (amount of drug debt already paid) wit this 50 (\$50,000)”. MAHONEY replied with a ‘thumbs up’ emoji.

21. On or about July 20, 2021, between approximately 3:09 p.m. and 3:10 p.m., MAHONEY and SMITH engaged in an iMessage conversation on the telephone. SMITH said, “Let’s meet up later today (for a cocaine kilogram and/or cocaine sales proceeds transaction).” SMITH then wrote, “I’m tryna get close to a 100 as possible (100% of the debt owed to MAHONEY)”. MAHONEY replied with a ‘thumbs up’ emoji and “waiting on u...”

22. On or about July 25, 2021, between approximately 9:08 p.m. and 9:18 p.m., MAHONEY and SMITH engaged in an iMessage conversation on the telephone regarding SMITH getting a cocaine sales proceeds payment together for MAHONEY. MAHONEY wrote, "Tomorrow?" SMITH replied, "Yea we good I justvrmtxtbthwo resin I'm waiting on." SMITH then sent MAHONEY a screen shot of a discussion between SMITH and one of SMITH's customers ("Tommie") regarding collecting money. MAHONEY stated, "Ok." SMITH replied, "Bruh my word hood n\*\*\*\*s am grinding slow in them tanks." SMITH then wrote, "But I'm gone get together," and, "Ihost some cash I just wanted to give it all to u at one time." MAHONEY replied, "I feel ya. Just need to be finished by the first (August 1, 2021)." SMITH replied, "Before the first forayed," and, "foresure." MAHONEY responded with a 'thumbs up' emoji.

23. On or about July 29, 2021, between approximately 12:32 p.m. and 2:18 p.m. MAHONEY and SMITH engaged in an iMessage conversation on the telephone regarding SMITH collecting money owed to MAHONEY for a drug debt. SMITH wrote, "Gone b about 20 (\$20,000) short of whole tab (whole amount owed to MAHONEY)." MAHONEY replied, "That's great news!" SMITH stated, "I know u over there panicking n s\*\*\* I just been grinding (to collect the drug debt owed to MAHONEY)." MAHONEY replied, "I'm too COOL to "panic."" MAHONEY continued, "Things will be right next time so we gonna have to fly to make up." SMITH responded, "Just been s\*\*\* together on my end."

24. On or about August 7, 2021, between approximately 12:21 a.m. and 12:43 a.m., MAHONEY and SMITH engaged in an iMessage conversation on the telephone regarding a drug debt that SMITH owed MAHONEY. MAHONEY stated, "Yo. It feels like I'm chasing you to get my s\*\*\* (cocaine sales proceeds owed by SMITH to MAHONEY). It's going on 3 weeks since you gave me anything. I don't work like this." SMITH replied, "Me neither Bruh I'm chasing a n\*\*\*\*a

(drug customer) too I just need a couple days real talk.” MAHONEY stated, “WE running out of time. Days turning into weeks and now weeks are turning into months. Tighten up and get me taken care (paid in full) of ASAP.” SMITH replied, “Give me couple days it’s slowing my s\*\*\* up real talk just need couple days I don’t play like this.”

25. On or about September 28, 2021, between approximately 2:13 p.m. and 2:41 p.m., MAHONEY and GLENN engaged in an iMessage conversation on the telephone. GLENN said, “Top morning Brody any good news (any information about when a resupply will happen)?” MAHONEY replied, “Not yet.” GLENN said, “Dzamnno no heads up either ? Bout to turn other phone off for the day.” MAHONEY said, “Yesterday they (MAHONEY’s cocaine suppliers) told me to be expecting a call (about a resupply of cocaine kilograms) in the next couple days.” GLENN replied, “Oh ok.” GLENN continued, “S\*\*\* I’m hoping we can beat the first and the other folks that’s the same thing I heard with them.”

26. On or about October 22, 2021, at approximately 8:52 p.m., ABRAHAM and SMITH engaged in conversation on the telephone regarding meeting at ABRAHAM’s house (3XXX West 112th Street, #UP, Cleveland, Ohio) to conduct a drug transaction. ABRAHAM said, “Hello?” SMITH replied, “What’s up?” ABRAHAM asked, “Where you at?” SMITH responded, “On the freeway, on 90.” ABRAHAM asked, “How long going to take you to get to my house?” SMITH said, “Bout fifteen minutes.” ABRAHAM replied, “Alright, come on.”

27. On or about October 22, 2021, at approximately 9:16 p.m., ABRAHAM and SMITH engaged in conversation on the telephone regarding how close SMITH is to ABRAHAM’s residence (3XXX West 112th Street, #UP, Cleveland, Ohio).

28. On or about October 22, 2021, at approximately 9:25 p.m., SMITH arrived at ABRAHAM's residence at 3XXX West 112th Street, #UP, Cleveland, Ohio operating his Chevrolet Camaro to conduct a drug transaction.

29. On or about October 24, 2021, at approximately 1:24 p.m., ABRAHAM and SMITH engaged in conversation on the telephone regarding the quality of cocaine SMITH provided to ABRAHAM on October 22, 2021. SMITH asked, "Hey, what's up?" ABRAHAM replied, "Hey there, it's Sammy." SMITH stated, "I know who it is." ABRAHAM stated "Um ... did we do anything different?" SMITH asked, "Watchu' mean?" ABRAHAM replied, "No, because last time it was wet, you know, I don't know who is uh, why is this different. Do you have anything better (higher quality)?" SMITH stated, "Man, you is crazy." ABRAHAM asked, "Why do you call me crazy? Why don't you say something about my mother? It might as well, you're sayin' anything else about me, n\*\*\*\*. Say something about my mom. So, I can call her and tell her, and put you on a three-way with her." SMITH stated, "Hum, how much you got? How much you for the day?" ABRAHAM stated, "Don't worry about that. I'm not asking you that. I just want you to be straight up with me. We're just doin' business, we're talkin'. That's all." SMITH replied, "Yeah, I got something different, man. I keep sum. You..." ABRAHAM stated, "Whatever." SMITH said, "...don't gotta ask me all the time." ABRAHAM said, "Oh really? A'ight, leave fi-, leave 5 (ounces of cocaine) in the freezer. And then take what you wanna, take the money out the freezer, a'ight?" SMITH replied, "A'right." ABRAHAM said, "A'right. I'm not gonna be there, you hear me?" SMITH stated, "I gotchu'." ABRAHAM replied, "I gotchu'."

30. On or about October 24, 2021, at approximately 1:32 p.m., ABRAHAM and SMITH engaged in conversation on the telephone to arrange for SMITH to bring 5 ounces of cocaine to ABRAHAM's house (3XXX West 112th Street, #UP, Cleveland, Ohio). SMITH said, "Yeah,



what's up?" ABRAHAM replied, "It's in the right-hand corner, you know. Leave the, the 5 (ounces of cocaine)..." SMITH replied, "Mm-hm." ABRAHAM continued, "...and then just put it in the same place where your money is." SMITH replied, "A'right." ABRAHAM stated, "A'right? Call me when when it's there." SMITH replied, "A'right." ABRAHAM stated, "Make sure, make sure you shut that uh, front door, all right?" SMITH stated "A'right." ABRAHAM stated, "A'right, bye."

31. On or about October 24, 2021, at approximately 3:46 p.m., ABRAHAM and SMITH engaged in conversation on the telephone regarding when SMITH will arrive at ABRAHAM's residence (3XXX West 112th Street, #UP, Cleveland, Ohio) to deliver the 5 ounces of cocaine. SMITH said, "I'm on the freeway, brah." ABRAHAM replied, "I'm on my way home. How far away are you?" SMITH stated, "I'm 'bout ten minutes away. I'm on the freeway, I'm on 90." ABRAHAM replied, "All right, I'll see you when you get there (3XXX West 112th Street, #UP, Cleveland, Ohio), then." SMITH stated, "A'right."

32. On or about October 24, 2021, at approximately 4:03 p.m., SMITH arrived to the area around ABRAHAM's residence at 3XXX West 112th Street, #UP, Cleveland, Ohio operating his (SMITH's) Chevrolet Camaro to conduct a drug transaction.

33. On or about October 24, 2021, between approximately 4:50 p.m., and 6:12 p.m., ABRAHAM and SMITH engaged in text message conversation on the telephone regarding SMITH coming back and delivering an additional amount of cocaine for ABRAHAM's friend. ABRAHAM asked, "Yes how far away are you from my house." SMITH replied, "Downtown." ABRAHAM asked, "How long to come here." SMITH replied, "Thirt," and then "Thirty (minutes)." ABRAHAM said, "Okay A friend of mine is coming I want to G's (two grams) of soft (cocaine) not hard (cocaine base/"crack")." SMITH replied, "Yup." ABRAHAM stated, "Put it in the door for

me.” SMITH replied, “Bout to b on my way.” ABRAHAM replied, “K in the door just text me when you leave ok?” SMITH replied, “Yup”.

34. On or about October 24, 2021, at approximately 7:00 p.m., SMITH arrived to the area around ABRAHAM’s residence at 3XXX West 112th Street, #UP, Cleveland, Ohio operating his (SMITH’s) Chevrolet Camaro to conduct a drug transaction.

35. On or about October 24, 2021, at approximately 7:03 p.m., ABRAHAM and SMITH engaged in a text message conversation on the telephone regarding ABRAHAM not paying SMITH enough for the cocaine SMITH delivered. SMITH wrote, “U short.” ABRAHAM replied, “I got you.” SMITH said, “If I’m charging 50 for done (cocaine mixed with other product) u know I ain’t charging 50 for undone (cocaine without additional ingredients) raw (cocaine without additional ingredients) 80 a pop (gram).” SMITH continued, “I don’t cut it (mix cocaine with additional ingredients) I give to u raw (cocaine with no additional ingredients).”

36. On or about October 25, 2021, between approximately 6:52 a.m. and 7:01 a.m., KNOWLES and SMITH engaged in a text message conversation on the telephone, to set up a cocaine transaction. KNOWLES wrote, “Funny for OR 5 (I need 4 or 5)”. KNOWLES then clarified, “I need.”

37. On or about October 25, 2021, between approximately 10:41 a.m. and 11:53 a.m. SMITH and KNOWLES engaged in a text conversation on the telephone to set up the delivery of ounces of cocaine to KNOWLES from SMITH. SMITH stated, “Ok,” and “Where u at shop (2XXX Hamilton).” KNOWLES replied, “can be (at 2XXX Hamilton),” then, “Don’t be all day.” KNOWLES then wrote, “Miss 300 (Short \$300 for the total owed)”. SMITH replied, “U always short,” then, “Get yo life together lol.”

38. On or about October 25, 2021, at approximately 11:53 a.m. KNOWLES and SMITH engaged in a phone conversation to discuss their drug transaction. KNOWLES said, "First of all, I'm 2 bands (\$2,000 in US Currency) over, for, so let's get that s\*\*\* out the way. And whatcu mean get my life together?" SMITH replied, "I'm talkin s\*\*\* (joking) bruh." KNOWLES laughed, then responded, "Mother f\*\*\*er, get the f\*\*\* out the bed before noon. I'm, I'm tellin you lil n\*\*\*a." SMITH replied, "You said you 2 bands (\$2,000.00) over?" KNOWLES replied, "Yeah." SMITH stated, "Oh, you bringing the extra 2 bands (\$2,000.00)?" KNOWLES replied, "Yeah".

39. On or about October 25, 2021, at approximately 12:02 p.m., KNOWLES sent SMITH a text message on the telephone. KNOWLES wrote, "Have it together (have the cocaine packaged/ready) when you pull up."

40. On or about October 25, 2021, at approximately 12:45 p.m., SMITH departed his apartment complex at 1XXX Weymouth Circle, Westlake, Ohio driving his Camaro.

41. On or about October 25, 2021, at approximately 12:53 p.m., SMITH sent KNOWLES a text message on the telephone. SMITH wrote, "6 minutes (until his arrival at the meeting location)."

42. On or about October 25, 2021, at approximately 1:02 p.m., SMITH's Camaro arrived at 2XXX Hamilton Avenue, Cleveland, Ohio (across the street from a warehouse frequented by SMITH) to conduct a drug transaction.

43. On or about October 25, 2021, at approximately 1:15 p.m., SMITH and KNOWLES engaged in a text message conversation on the telephone. KNOWLES wrote, "What that 4 (ounces)." SMITH replied, "5 (ounces)."

44. On or about October 25, 2021, at approximately 2:16 p.m., KNOWLES walked out of the warehouse at 2XXX Hamilton Avenue, Cleveland, Ohio. KNOWLES crossed the street, entered his Lincoln, bearing Ohio tag JLN7069, and departed the area of the warehouse.

45. On or about October 26, 2021, at approximately 3:52 p.m., KNOWLES and SMITH engaged in conversation on the telephone regarding the pace at which KNOWLES is selling cocaine. KNOWLES asked, "Like everything cool?" SMITH replied, "What you mean?" KNOWLES said, "I mean, you know what cool mean right?" SMITH stated, "Nah, that's why I said, what you mean?" KNOWLES replied, "I mean, like, you okay, with like, how we are doing everything, like it ain't no..." SMITH replied, "I mean, nah..." KNOWLES said, "Ain't no f\*\*\*ing pay." SMITH stated "...Ain't no, ain't no pressure, I wish, I wish you'd go a little faster, but ain't no pressure." KNOWLES then said, "I mean, I mean, I could try but, you know." SMITH replied, "Hey, you cool." KNOWLES stated, "I just making sure it's all there (payment for cocaine)" SMITH replied, "Oh, yeah, you cool." KNOWLES said, "Nah, okay, nah, I'm just asking." SMITH replied, "Yeah, we gu, we Gucci, ain't no pressure." KNOWLES stated, "I know, I mean..." SMITH said, "S\*\*\*, as long as the money right." KNOWLES stated, "I want to go a little faster, trust me bro." SMITH replied "Yeah, I, n\*\*\*\* go a little faster, n\*\*\*\* it'd be, it'd, it'd be great." KNOWLES stated, "Yeah, I'am, trust me I know." SMITH replied, "Yeah, we Gucci." KNOWLES stated, "A'right." SMITH said, "Oh, you know if I ever got, got like, if ever got like, like, they ever, like they ever call me and be like, 'Hey I need the money,' I'd call you and be like 'Hey I need the money real quick.' You know what I'm saying? But other than that, nah, we cool." KNOWLES replied, "A'right, no I'm, no I'm trying, cause, I'm trying to get to a point like no, don't worry about it. The money is all there." SMITH said, "You funny as f\*\*\*." KNOWLES stated, "I'm serious, I don't want to owe a n\*\*\*\*." SMITH replied, "No, I know that, I know you, I know you good for it, I ain't worry, I'm

never worry about that.” SMITH continued, “You, did I bring what you asked me to bring?”

KNOWLES replied, “Uh huh.” SMITH stated, “Alright, I just, I, you said four or five (ounces) and I just about ...” KNOWLES replied, “Yeah, I mean, I’m just telling cause, I know, like, nah, cause, I still had two (ounces) left so.”

46. On or about October 28, 2021, at approximately 7:34 p.m. SMITH and MAHONEY engaged in a conversation on the telephone to arrange a cocaine transaction at SMITH’s apartment complex, 1XXX Weymouth Circle, Westlake, Ohio. MAHONEY stated, “you ready for me to come?” SMITH replied, “yeah, I said come on.”

47. On or about October 28, 2021, at approximately 8:05 p.m., MAHONEY drove his GMC Sierra into the parking lot of SMITH’s apartment complex at 1XXX Weymouth Circle, Westlake, Ohio.

48. On or about October 28, 2021, at approximately 8:12 p.m., SMITH exited the main door to his apartment building at 1XXX Weymouth Circle, Westlake, Ohio empty-handed and walked towards MAHONEY’s GMC Sierra. Moments later, SMITH walked back towards his apartment building carrying a grocery bag containing kilograms of cocaine. As he walked back to the apartment building, SMITH looked around cautiously.

49. On or about October 28, 2021, at approximately 9:35 p.m., ABRAHAM and SMITH engaged in conversation on the telephone regarding ABRAHAM ordering four ounces of cocaine from SMITH. SMITH asked, “What up?” ABRAHAM replied, “I’m feeling a certain kind of way bro and I don’t know what to say. Either my, my dollar ain’t too strong or you don’t love me no more one of the two things, which one is it?” SMITH stated, “Man, everything I ever gave you, you told me it was garbage (poor quality cocaine).” ABRAHAM replied, “I don’t know, I’m just, bro. I’m going to be honest with you, I’m an old man, I don’t know how to lie bro. I can only tell you how

I'm feeling man. You know, I, I mean I really don't. Didn't you just tell me you did something different or not?" SMITH asked, "You say what?" ABRAHAM replied, "Do anything different ...." SMITH responded, "I mean, I'm a cook something (cocaine product) different tonight, but I ain't, I ain't got nothing different at, at the moment." ABRAHAM asked, "How far are you from my house Dez?" SMITH replied, "I'm downtown." ABRAHAM asked, "It's nasty there, are you free? Are you coming?" SMITH replied, "I mean, is going to be a little minute." ABRAHAM asked, "Uhm, you want me to go downtown? I can do that." SMITH responded, "Yeah, I'm at the casi, I'm at the casino." ABRAHAM stated, "Alright, I'll call you when I, you want me to go to the parking lot or meet you upfront? I'll pull up front." SMITH replied, "A'ight.. ABRAHAM asked, "Alright? You can, you got your ruler (drug scale)?" SMITH replied "Yeah, I got it. What you want?" ABRAHAM stated, "A'ight. Four (ounces)." SMITH replied, "A'ight."

50. On or about November 4, 2021, at approximately 12:38 a.m., GLENN sent MAHONEY an iMessage on the telephone, stating, "5 mins (until GLENN's arrival)."

51. On or about November 4, 2021, at approximately 12:52 p.m. MAHONEY drove his GMC Sierra to a shopping center located at 2XXXX Libby Road, Maple Heights, Ohio. MAHONEY met with GLENN, who drove an Infiniti SUV with temporary tag "N282584," for a cocaine and/or cocaine sales proceeds transaction.

52. On or about November 4, 2021, at approximately 4:33 p.m., ABRAHAM and SMITH engaged in a conversation on the telephone regarding ABRAHAM ordering four ounces of cocaine from SMITH. ABRAHAM asked, "Listen, you got, you got something good for real this time?" SMITH replied, "Yeah." Later in the conversation, ABRAHAM stated, "And I need four (ounces)." SMITH replied, "A'right."

53. On or about November 8, 2021, at approximately 2:05 p.m., ABRAHAM and SMITH engaged in conversation on the telephone regarding SMITH providing ABRAHAM with additional newly prepared cocaine. SMITH said, "I got genuine, I got genuine, I got genuine love for you." ABRAHAM replied, "You know, I thought that too, but you gave me the same s\*\*\* (poor quality cocaine), you told me it was different and it wasn't Dez, you can't lie to me man, me and you don't do that no more, we don't do, I see if it might have been the first day or second time. I, I, I don't know what to say Dez. You know I want, I want to keep dealing with you (purchasing cocaine from SMITH for re-distribution), but I don't want that garbage (poor quality cocaine) man, you need to hook me up man, seriously." SMITH replied, "Alright, I'ma, I'ma, going to make a whole new batch (of crack cocaine) man." ABRAHAM said, "Right now, though. I'm not, I, I mean, that's why I'm calling you early. I want to get off early because I have a lot of work to do tomorrow." SMITH stated, "Alrigh, a'ma make a new, a'ma make a new batch." ABRAHAM stated, "I want you to make it right, right now." SMITH replied, "Alrigh, I'll call you as soon as I'm done." ABRAHAM stated, "I want to know how long it will be." SMITH replied, "Give me about, I'm going to need about 40 minutes." ABRAHAM stated, "A'igh, then you'll come to the house (3XXX West 112<sup>th</sup> Street, #UP, Cleveland, Ohio), right?" SMITH replied, "Yeah."

54. On or about November 8, 2021, at approximately 3:20 p.m., ABRAHAM arrived at his residence (3XXX West 112<sup>th</sup> Street, #UP, Cleveland, Ohio) operating a 2012 Chevrolet Express Van bearing Ohio Plate JNR-4335 and pulled into the driveway of his residence.

55. On or about November 8, 2021, at approximately 4:01 p.m., SMITH sent a text message to ABRAHAM on the telephone, stating, "I'm outside."



56. On or about November 8, 2021, at approximately 4:01 p.m., SMITH pulled into ABRAHAM's driveway (3XXX West 112<sup>th</sup> Street, #UP, Cleveland, Ohio) driving his Chevrolet Silverado truck, for a drug transaction.

57. On or about November 8, 2021, at approximately 4:20 p.m., SMITH entered back into the driver's seat of his Chevrolet Silverado Truck and departed ABRAHAM's driveway 3XXX West 112<sup>th</sup> Street, #UP, Cleveland, Ohio.

58. On or about November 10, 2021, at approximately 6:28 p.m., SMITH called ABRAHAM on the telephone to discuss SMITH going to ABRAHAM's residence (3XXX West 112<sup>th</sup> Street, #UP, Cleveland, Ohio). SMITH stated, "I'm at your house (3XXX West 112<sup>th</sup> Street, #UP, Cleveland, Ohio), bro." ABRAHAM stated, "Huh?" SMITH responded, "I'm at your house". ABRAHAM replied, "Okay, good. Did you go to the kitchen (mix the cocaine)?" SMITH said, "Come on, man! I ain't got all day. I got, I got somewhere to go." ABRAHAM replied, "A'right but, but leave it, did you leave it (the cocaine) just straight (pure)?" SMITH stated, "Man, you asked me that s\*\*\* over and over again." ABRAHAM stated, "Oh, come on, man. Just put it (cocaine) on, leave it on the ruler (scale). Leave it on the, leave it on the table and shut the door behind you." SMITH asked, "Where the fxxx the light at in this bxxxx?" ABRAHAM replied, "Nxxxx, you know where the money (payment for drugs) is..." SMITH stated, "... With the light." ABRAHAM stated, "The what? Leave the lights (actual lights) on." SMITH said, "Alright, it, it will be here (3XXX West 112<sup>th</sup> Street, #UP, Cleveland, Ohio). Where you want me to put it (cocaine)?" ABRAHAM stated, "Leave it on the table, leave it on the ruler (scale)." SMITH stated, "A'igh." ABRAHAM stated, "You got four (ounces), you got four on the ruler (scale)? Dez (SMITH)?" SMITH stated, "I'm 'bouta put. Yeah, come on man, you know I never short you (give you less cocaine than you paid for) man."



59. On or about December 3, 2021, at approximately 11:22 p.m., MCGINNIS called MAHONEY on the telephone to discuss a drug debt owed to MAHONEY. MCGINNIS said, "What up bleed." MAHONEY responded, "Hey, uhm, I'm, I'm over here checking this out, you know, a couple of these are off (money is short)." MCGINNIS replied, "Huh?" MAHONEY said, "Like, uhm, two of them (bands of money for kilograms payments) were, you know, they were, they were supposed to be tens (bands of \$10,000) and stuff." MCGINNIS replied, "Huh?" MAHONEY said, "Two of them (bands of money) were nine (\$9,000) and one (band of money) was only seven (\$7,000)." MCGINNIS again replied, "Huh?" MAHONEY stated, "Yeah. I'm, I'm, I'm over here looking, you know, I'm here checking. It had no..." MCGINNIS stated, "Yeah, I don't, I don't, I don't do that (short drug payments)." MAHONEY stated, "I, I know. It had, it had the uhm, what the rubber bands on it, the uhm, the pale ones." MCGINNIS responded, "Uhm, uhm... I know damn well you ain't 'bout to call me last, so I got to figure it out, on how did that happen. So..." MAHONEY said, "Damn bro." MCGINNIS stated, "It is, it is what it is, I'll uhm take care of it no problem. Right now I need to, I need to know how that happened." MAHONEY replied, "Yeah...But..." MCGINNIS stated, "I don't, I don't make mistakes like that." MAHONEY said, "I know you don't, but, but you know what rubber bands I'm talking about right?" MCGINNIS responded, "Yeah." MAHONEY stated, "Okay. A'ig, A'ight my man." MCGINNIS responded "A'ight bleed, I got you."

60. On or about December 15, 2021, MAHONEY and LOCK engaged in a text message conversation on the telephone. The two discussed a meeting during the upcoming weekend because LOCK wanted to "lighten my load (pay back cocaine sales proceeds) this weekend."

61. On or about December 20, 2021, MAHONEY and LOCK engaged in a text message conversation on the telephone. LOCK and MAHONEY agreed to meet on December 21, 2021 in order for the drug debt to be paid from LOCK to MAHONEY.

62. On or about December 21, 2021, MAHONEY and LOCK engaged in a text message conversation on the telephone. LOCK and MAHONEY agreed to meet at approximately 10:00 a.m. that day.

63. On or about December 21, 2021, at approximately 10:08 a.m., LOCK arrived at 8XX/8XX E 140th Street, Cleveland, Ohio (a warehouse owned by LOCK) in a Chevrolet taupe pickup truck and parked next to MAHONEY, who was driving his GMC Sierra. LOCK approached MAHONEY's truck, and subsequently shut the back compartment to MAHONEY's truck. LOCK departed the warehouse driving his taupe Chevrolet pickup. MAHONEY returned to his residence and unloaded a large bag (containing cocaine sales proceeds) into his garage.

64. On or about December 30, 2021, at approximately 3:40 p.m. and 3:46 p.m. GLENN called MAHONEY twice on the telephone.

65. On or about December 30, 2021, at approximately 3:24 p.m., MAHONEY departed his residence at 1XXXX Pebblebrook Trail, North Royalton, Ohio driving a GMC Sierra. At approximately 3:42 p.m., MAHONEY arrived at the bowling alley, RollHouse Parma, located at 1XXXX Brookpark Road, Parma, Ohio, driving his GMC Sierra. Moments later, GLENN arrived at the bowling alley operating a black Infiniti bearing temporary tag "N282584" and parked next to MAHONEY. GLENN approached MAHONEY's GMC Sierra and delivered cocaine sales proceeds to MAHONEY while at MAHONEY's vehicle. GLENN then reached into MAHONEY's vehicle and retrieved a white box containing kilograms of cocaine.

66. On or about December 30, 2021, MAHONEY purchased 1XX Park Avenue, Conneaut, OH 44030 and 1XX Park Avenue, Conneaut, Ohio 44030, both from R&E Growth Properties Ltd., for a listed price of \$80,000.00, with cocaine sales proceeds. MAHONEY paid for the properties in cash.

67. On or about January 7, 2022, at approximately 2:54 p.m. MAHONEY and LOCK engaged in a conversation on the telephone. LOCK stated, "I wanna lighten all the way up (pay back cocaine sales proceeds)..." Later in the call, LOCK told MAHONEY he needs to see him (to receive drugs from MAHONEY). Later in the conversation LOCK and MAHONEY agreed to meet on January 8, 2022, for LOCK to pay a drug debt to MAHONEY and for MAHONEY to distribute additional kilograms of cocaine to LOCK.

68. On or about January 7, 2022, at approximately 4:51 p.m., MAHONEY and LOCK engaged in a conversation on the telephone. During the call, the two agreed to push back the drug and cash transaction until Monday, January 10, 2022.

69. On or about January 10, 2022, at approximately 8:43 a.m., LOCK was at a warehouse at 8XX E 140th Street, Cleveland, Ohio, in his Taupe Chevrolet Silverado truck and parked.

70. On or about January 10, 2022, at approximately 9:04 a.m., MAHONEY arrived at the warehouse (owned by LOCK) at 8XX/8XX E 140th Street, Cleveland, Ohio, operating a GMC Sierra. MAHONEY met with LOCK and exchanged cocaine for US currency. Following the meet, MAHONEY returned to his residence and unloaded a large bag of cocaine sales proceeds into his garage.

71. On or about January 10, 2022, at approximately 4:41 p.m., LOCK called MAHONEY on the telephone. During that call, LOCK stated, "Yeah you know that this different (different cocaine product), right?" MAHONEY stated, "Different?" and "I mean I, I, I, know it (cocaine) was

packed different.” LOCK stated, “Yeah, it's (kilograms of cocaine) totally different. And...”

MAHONEY stated, “Like bad (poor quality)?” LOCK replied, “Yeah. I'mma have to come, I gotta go put, go ahead...” MAHONEY stated, “Well let, let me come, let me come, let me come and get 'em (kilograms of cocaine) tomo-, tomorrow then.” LOCK replied, “I mean I'm, I'mma get, see what they say. Let me see, I just checked it (cocaine) myself out.” MAHONEY stated, “A'right, I, I don't, I don't wanna, I don't wanna lose anything or I don't wanna f\*\*\* with 'em (kilograms of cocaine) if they're bad.”

72. On or about January 10, 2022, at approximately 4:51 p.m. MAHONEY and LOCK engaged in a text message conversation on the telephone. LOCK wrote, “And let them (MAHONEY's suppliers) know they (kilograms of cocaine) down to 29 and 30 (\$29,000 to \$30,000) on the streets”. MAHONEY stated “Ok.”

73. On or about January 10, 2022, at approximately 4:55 p.m., LOCK called MAHONEY on the telephone. LOCK said, “Yeah, don't let 'em (MAHONEY's suppliers) do us like that (overcharge for kilograms of cocaine). We already got the highest ticket (highest-priced cocaine) out here.” MAHONEY replied, “So...” LOCK interjected, “Don't let 'em (MAHONEY's suppliers) do it. Yeah, I dunno' I ju-, uh I'll, they'll let me know. All of this, we'll see. I, 'cause I, what I do, I go check it before I do anything. I don't wanna go through that. So, it didn't cook... it ain't... [voices overlap].” MAHONEY stated, “Yeah, yeah, yeah. Well, you see I don't open 'em (kilograms of cocaine). I, I, I leave...” LOCK stated, “I already know, I know, I, hey, I ain't puttin' it on you. I ain't...” MAHONEY replied, “Yeah.” Later in the conversation, MAHONEY stated “So, so, so after you... [voices overlap].” LOCK stated, “Go ahead.” MAHONEY stated, “...checked it, it, it's a no-go (poor quality)? Or...”. LOCK stated “No, no, no, no! I just checked it, I, I got somebody taste it (check the quality of cocaine) and what uh, it didn't give us the, like it usually do with the numbers

and all..." MAHONEY replied, "Okay, Okay." LOCK stated, "...it was all messed, it didn't do right." MAHONEY stated, "Okay." LOCK stated, "But I got it together." MAHONEY stated "A'right." LOCK stated, "So, it's just a change, 'cause don't, it's never gonna be the same like that stuff, it does changes." MAHONEY stated, "Alright, well um yeah, if you can see the stamp because um, you know just so if I have to switch it out (exchange kilograms of cocaine) make sure I don't bring you any more of those (poor quality kilograms of cocaine)." LOCK replied, "Please, okay well I'll let you know. Let me, let me, I'll let you know." MAHONEY stated, "A'right that's what's up." LOCK stated, "Yeah, well heads up on it. I'll let you know, but don't. Yeah, they kinda, they low out here now (cocaine kilogram prices are low). I know you heard that." MAHONEY stated, "A'right, okay."

74. On or about January 15, 2022, at approximately 1:47 p.m., MAHONEY and MCGINNIS engaged in a conversation on the telephone. MAHONEY said, "How are you?" MCGINNIS replied, "Uh, I wish I could say I was, I wish could say I was doing super good and peaches and cream but s\*\*\*, it's not the case." MAHONEY stated, "Oh, oh man." MCGINNIS replied, "... though. I, I remember." MAHONEY said, "No problem." MCGINNIS stated, "Mm?" MAHONEY said, "So, can we uh, meet up like tomorrow (for a cocaine sales proceeds transaction)?" MCGINNIS replied, "Um..." MAHONEY stated, "Or Monday?" MCGINNIS said, "You're not back? I mean, you're not here?" MAHONEY replied, "I'm here but um, today I, I kinda got some things going on." MCGINNIS stated, "Okay um, yeah, I'll meet you tomorrow (for a cocaine sales proceeds transaction)." MAHONEY said, "A'right." MCGINNIS stated, "Oh my back hurt. Yeah, I'm uh, just call me with the time. I'll meet you..." MCGINNIS continued, "...tomorrow." MAHONEY replied, "That's what's up."

75. On or about January 17, 2022, at approximately 11:54 a.m., MAHONEY sent a text message to MCGINNIS on the telephone, stating, "Make sure we get together next week (for a cocaine sales proceed transaction)."

76. On or about January 19, 2022, at approximately 7:40 a.m., BOJORQUEZ called MAHONEY on the telephone to set up a meeting for the following day, January 20, 2022. During the call, BOJORQUEZ said, "How are you?" MAHONEY replied, "I'm doin' well, how are you?" BOJORQUEZ said, "Good good good uh, tomorrow breakfast (meeting to exchange cocaine sales proceeds from MAHONEY to BOJORQUEZ)?" MAHONEY replied, "Tomorrow, tomorrow um... around what uh... around the norm (normal time)? 'Cause I know I got a meeting around 8:30, 9:00 at work." BOJORQUEZ said, "Okay, um ... can you do 10:00?" MAHONEY responded, "Around 10:00?" BOJORQUEZ said, "Yeah, I should be, 9:30, 10:00 would be good." MAHONEY said, "Okay, a'right." BOJORQUEZ stated, "Okay, a'right see you tomorrow."

77. On January 19, 2022, BOJORQUEZ travelled from Chicago, Illinois to Cleveland, Ohio via Southwest Flight #888, arriving at approximately 9:11 p.m.

78. On or about January 19, 2022, at approximately 9:52 a.m., MAHONEY and GLENN engaged in a Facetime call on the telephone.

79. On January 19, 2022, in Cleveland, Ohio, BOJORQUEZ rented a White Audi SUV with Texas Plate NTV6624 at the Cleveland Hopkins Airport, at approximately 9:56 p.m.

80. On January 19, 2022, BOJORQUEZ rented Room 918, at the Crowne Plaza Hotel at 1XXX Euclid Ave, Cleveland, Ohio, between approximately 10:11 and 10:33 p.m.

81. On or about January 19, 2022, at approximately 10:36 a.m., LOCK called MAHONEY on the telephone. LOCK stated, "Hey uh, I don't think that paper right (drug ledger). The last time we talked it was at um... and you gave me fourteen more (kilograms of cocaine). I

don't think that's right." MAHONEY stated, "Well, I, I, I thought you said you gave me three (\$300,000) the last time, but it was only two (\$200,000)." LOCK stated "I think it was two, I'm not for sure." MAHONEY continued, "Oh..." LOCK stated, "I got ... but I know even if... that thing, I don't think that's right because... what, what's the price." MAHONEY stated, "I'm sorry, what's that?" LOCK replied, "What's my ticket (price per kilogram for all the kilograms) for them?" MAHONEY responded, "Uh for the, for which ones?" LOCK stated, "For all of them, I thought we was in the, we had a, ... five (stating \$31,500)." MAHONEY stated, "Yeah, thirty-one, five (\$31,500.00)." LOCK stated, "Right, okay, so you... if you do the math, I'mma go home and do it. I'm at a funeral now." MAHONEY replied, "Oh yeah, well go double check 'cause I, I did thirty-one, five (\$31,500.00) times fifty-seven (57 kilograms)." LOCK stated, "Times fifty-seven, did you take the seven off (\$7,000 off of drug debt owed) on the short ones (kilograms that didn't weigh enough) last time?" MAHONEY said, "Oh, I thought you uh, I thought..." Later in the conversation, LOCK said, "Whatever, yeah, we'll talk about it. Okay anyway, we're straight and you know me, you gonna straighten it anyway." MAHONEY stated, "Well just, I just wanted to send that to you so you could look and see where we're at and make sure we're on the same..." LOCK interjected, "Okay, that ain't no problem, I'm, you know I ain't never come sh-, I gotchu', whatever it is, whatever it is to make it right with them but you gotta know the, they out her twenty-nine to thirty (\$29,000.00 to \$30,000.00 per kilogram) - I'm talkin' 'bout on the street." MAHONEY replied, "I know, man, I got twenty more (kilograms) in my possession, I gotta flush, I gotta get rid of them to try to get to the new batch (resupply of kilograms of cocaine) for a new number (price per kilogram), man."



82. On or about January 19, at approximately 10:46 a.m., MAHONEY sent a text message to MCGINNIS on the telephone. MAHONEY said, "My bad the other day....Can we meet today (for a cocaine sales proceeds transaction)?"

83. On or about January 19, 2022, at approximately 12:55 p.m., MAHONEY and MCGINNIS engaged in a conversation on the telephone. MCGINNIS said, "Hello?" MAHONEY replied, "What's happenin'?" MCGINNIS said, "I'm knocked out (asleep), man." MAHONEY said, "I knew it was too early to call you." MCGINNIS replied, "Hell yeah, man..." MAHONEY stated, "Just make, well I just wanted to put the bug in your um, make sure you get with me today (for a cocaine sales proceeds transaction)." MCGINNIS stated, "A'right..." MAHONEY said, "I know I bulls\*\*\*ted the other day but um..." MCGINNIS replied, "I know..." MAHONEY said, "A'right..." MCGINNIS stated, "...I gotta wait for her to get back at two... at two, thirty or somethin' like that but um... s\*\*\*. I got um... I'll just talk to you when I see you (for a cocaine sales proceeds transaction), man. I ain't gonna 'bouta see you for a hour." MAHONEY stated, "We don't have no issues (inability to pay drug debt) do we?" MCGINNIS replied, "Um, I got issues, you ain't go no issues." MAHONEY said, "Ahh... okay." MAHONEY continued, "A'right, well s\*\*\*, just um holler at me when um when you ready (to meet for a cocaine sales proceeds transaction)." MCGINNIS responded, "Okay."

84. On or about January 19, 2022, between approximately 3:30 p.m. and 9:52 p.m., MAHONEY and GLENN engaged in an iMessage conversation on the telephone to arrange a cocaine and/or cocaine sales proceeds transaction. GLENN said, "Time u done with M.M. (a person known to the Grand Jury but not indicted herein)?" MAHONEY responded "8-9." GLENN replied, "Ok," and "Headed over towards state rd in bout ten mins leaving from off st Clair a hit u when I get



close.” MAHONEY responded, “Ok.” GLENN stated, “A b (about) to state rd ten min.”

MAHONEY stated, “Where u want me to go?”

85. On or about January 19, 2022, at approximately 10:00 p.m., MAHONEY departed his residence at 1XXXX Pebblebrook Trail, North Royalton, Ohio driving his GMC Sierra.

86. On or about January 19, 2022, at approximately 10:12 p.m., MAHONEY and GLENN engaged in a Facetime call on the telephone.

87. On or about January 19, 2022, at approximately 10:15 p.m. MAHONEY arrived at State Road Beverage & Deli located at 4XXX State Road, Cleveland, Ohio operating his GMC Sierra. GLENN approached MAHONEY’s GMC Sierra and spoke through the window of MAHONEY’s GMC Sierra. GLENN handed MAHONEY a blue package containing two kilograms of cocaine. GLENN and MAHONEY parted ways at approximately 10:24 p.m.

88. On or about January 19, 2022, at approximately 10:28 p.m., MAHONEY and S.C. (a person known to the grand jury but not indicted herein) engaged in conversation over the telephone. MAHONEY informed S.C. that he (MAHONEY) had two kilograms of cocaine for S.C. MAHONEY stated, “Hey um, I was going through the locker room and um, I found two blue um, jerseys left (two kilograms of cocaine). I didn't know if you wanted to give those (2 kilograms) a try.” S.C. replied, “Uh, I know I had Jay ... blew one bag.” MAHONEY stated, “A'right.” S.C. stated, “Uh, oh man, gonna say uh, I mean I guess I can look at 'em (the two kilograms) though.” MAHONEY stated, “A'right. If you don't mind looking at it. You know...” S.C. said, “Yeah.” MAHONEY continued, “...and I could tell, and I could tell you what um ... had said too about the um, the recipe.” S.C. replied, “Okay, okay, okay. A'right, a'right. S\*\*\*, we shoot for tomorrow then.” MAHONEY replied, “right, that's what's up.”

89. On or about January 19, 2022, at approximately 6:56 p.m., MAHONEY called MCGINNIS on the telephone. MCGINNIS answered "Can you what, can you what, hello?" MAHONEY said, "What's happenin'?" MCGINNIS stated, "My back is what's happenin'. Where you at? You at home?" MAHONEY replied, "Man, around the corner." MCGINNIS asked, "Huh?" MAHONEY replied, "I said, I'm around the corner." MCGINNIS said, "Well I'm, I'm at the house (1XXX David Avenue, Parma, Ohio), pull up over here right quick." MAHONEY stated, "A'right."

90. On or about January 19, 2022, at approximately 7:06 p.m., MAHONEY arrived at 1XXX David Ave, Parma, Ohio, operating his GMC Sierra truck, and pulled into the driveway.

91. On or about January 19, 2022, at approximately 7:06 p.m., MAHONEY called MCGINNIS on the telephone. MCGINNIS said, "Hello?" MAHONEY responded, "Yeah, I'm outside." MCGINNIS stated, "Huh?" MAHONEY said, "I'm outside (of 1XXX David Ave, Parma, Ohio)" MCGINNIS replied, "Come on, come in." MAHONEY stated, "A'right."

92. On or about January 19, 2022, at approximately 7:20 p.m., MAHONEY departed 1XXX David Ave, Parma, Ohio driving his GMC Sierra.

93. On or about January 20, 2022, at approximately 7:40 a.m., MAHONEY sent BOJORQUEZ a text message on the telephone that stated, "I can do 9:30am (for a meeting to exchange cocaine sales proceeds from MAHONEY to BOJORQUEZ)"

94. On or about January 20, 2022, at approximately 7:57 a.m., MAHONEY departed his residence at 1XXXX Pebblebrook Trail, North Royalton, Ohio driving a GMC Sierra.

95. On or about January 20, 2022, at approximately 9:13 a.m. BOJORQUEZ called MAHONEY on the telephone. During the call, BOJORQUEZ said, "Um, still at nine thirty (for the meeting to exchange cocaine sales proceeds from MAHONEY to BOJORQUEZ)? About fifteen

minutes away or?” MAHONEY replied, “Y-, yeah, yeah. I’m ‘bout to um, right on time.”

BOJORQUEZ said, “Okay. A’right, cool.”

96. On or about January 20, 2022, at approximately 9:23 a.m., BOJORQUEZ exited the Crowne Plaza Hotel located at 1XXX Euclid Ave, Cleveland, Ohio and departed in the White Audi.

97. On or about January 20, 2022, at approximately 9:31 a.m., BOJORQUEZ called MAHONEY on the telephone. BOJORQUEZ told MAHONEY, “A’right I’m like one minute away (from the meeting location).” MAHONEY responded, “A’right. I-, is there a certain one (street) you want me to go down?” BOJORQUEZ replied, “Excuse me?” MAHONEY said, “Which one (street) should I go down?” BOJORQUEZ responded, “Uh, maybe, let’s see here, thirty-eight (East 38<sup>th</sup> Street, Cleveland, Ohio)? Maybe?” MAHONEY stated, “A’right I’m passing thirty-five (East 35<sup>th</sup> Street, Cleveland, Ohio) now.”

98. On or about January 20, 2022, at approximately 9:34 a.m., MAHONEY drove his GMC Sierra down East 38<sup>th</sup> Street, Cleveland, Ohio and parked in front of BOJORQUEZ. MAHONEY and BOJORQUEZ the then drove in tandem around the block. BOJORQUEZ and MAHONEY then parked next to each other on East 37<sup>th</sup> Street near the intersection of Stanly Tolliver Avenue in Cleveland, Ohio.

99. On or about January 20, 2022, at approximately 9:35 a.m., MAHONEY unloaded several black tote bins with yellow lids, containing cocaine sales proceeds, from his GMC Sierra and put them into the white Audi rental, driven by BOJORQUEZ. MAHONEY and BOJORQUEZ immediately departed the area after the exchange.

100. On or about January 20, 2022, at approximately 10:26 a.m., BOJORQUEZ unloaded the tote bins, containing cocaine sales proceeds, received from MAHONEY earlier that day, at 6XXX Carnegie Avenue, Cleveland, Ohio, the Sussen Storage Facility, Unit 408.

101. On or about January 20, 2022, at approximately 10:26 a.m., BOJORQUEZ possessed a cellphone and Audi car keys.

102. On or about January 20, 2022, at approximately 11:20 a.m., MAHONEY possessed a safe which contained approximately 20,017 grams of cocaine, 3,469 gross grams of marijuana, \$170,880.00 in United States Currency, and a drug ledger at 1XXX Pebblebrook Trail, North Royalton, Ohio.

103. On or about January 20, 2022, at approximately 6:57 p.m., BOJORQUEZ possessed \$2,399,585.00 in United States currency, shrink-wrapped and labeled with the name "Mookie" (MAHONEY), secreted within microwaves on a pallet, at 6000 Carnegie Avenue, Unit 408, Cleveland, Ohio.

104. On or about January 20, 2022, at approximately 6:57 p.m., LOCK possessed drug trafficking materials and paraphernalia at 991 Nathaniel Road, Cleveland, Ohio.

105. On or about May 18, 2022, at approximately 2:24 a.m., SMITH possessed a loaded Springfield Armory Hellcat, 9 millimeter handgun, bearing serial number BA213755, and ammunition, approximately 26.21 grams of cocaine base ("crack"), approximately 38.15 grams of cocaine, approximately 54.45 grams of a heroin and fentanyl mixture, \$3,528.00 of drug proceeds, and 8 cellular phones.

COUNT 2

(Conspiracy to Launder Monetary Instruments, 18 U.S.C. § 1956(h))

The Grand Jury further charges:

106. From on or about October 21, 2019 until on or about May 19, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MARC MAHONEY did knowingly combine, conspire, and agree with R.S. (an individual known to the grand jury but not indicted herein) and other persons known and unknown to the Grand Jury, to commit offenses against the

United States in violation of Title 18, United States Code, Section 1956, to wit: knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, that is, cash purchases of properties in and around Conneaut, Ohio, which transactions involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 3

(Possession with Intent to Distribute Cocaine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

107. On or about January 20, 2022, in the Northern District of Ohio, Eastern Division, Defendant MARC MAHONEY, aka BEAR, aka MOOKIE, did knowingly and intentionally possess with intent to distribute 5,000 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT 4

(Interstate Travel in Aid of Racketeering, 18 U.S.C. § 1952(a)(3) and 2)

The Grand Jury further charges:

108. On or about January 19, 2021, in the Northern District of Ohio, Eastern Division, Defendant, JESSE BOJORQUEZ did travel in interstate commerce between the State of Illinois and the State of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the

promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and then said BOJORQUEZ thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNT 5

(Possession with Intent to Distribute Controlled Substances, 21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury further charges:

109. On or about May 18, 2022, in the Northern District of Ohio, Eastern Division, Defendant DESMOND SMITH, aka DEZ did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B).

COUNT 6

(Possession with Intent to Distribute Cocaine Base ("Crack"), 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

110. On or about May 18, 2022, in the Northern District of Ohio, Eastern Division, Defendant DESMOND SMITH, aka DEZ did knowingly and intentionally possess with intent to distribute approximately 26.21 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT 7

(Possession with Intent to Distribute Cocaine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

111. On or about May 18, 2022, in the Northern District of Ohio, Eastern Division, Defendant DESMOND SMITH, aka DEZ did knowingly and intentionally possess with intent to distribute approximately 38.15 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT 8

(Felon in Possession of Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

112. On or about May 18, 2022, in the Northern District of Ohio, Eastern Division, Defendant DESMOND SMITH, aka DEZ, knowing he had previously been convicted of crimes punishable by imprisonment for terms exceeding one year, those being: Aggravated Robbery, a felony of the first degree, on or about March 20, 2012, in Case Number CR-10-540358-B; Burglary, a felony of the second degree, on or about March 20, 2012, in Case Number CR-11-554176-A, and Trafficking in Drugs, a felony of the third degree, on or about September 12, 2018, in Case Number CR-18-625713-A; all in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Springfield Armory Hellcat, 9 millimeter handgun, bearing serial number BA213755, and ammunition, said firearm and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 9

(Felon in Possession of Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

113. On or about May 18, 2022, in the Northern District of Ohio, Eastern Division, Defendant DESMOND SMITH, aka DEZ, knowing he had previously been convicted of crimes

punishable by imprisonment for terms exceeding one year, those being: Aggravated Robbery, a felony of the first degree, on or about March 20, 2012, in Case Number CR-10-540358-B; Burglary, a felony of the second degree, on or about March 20, 2012, in Case Number CR-11-554176-A, and Trafficking in Drugs, a felony of the third degree, on or about September 12, 2018, in Case Number CR-18-625713-A; all in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Sig Sauer, Model P238, .380 handgun, bearing serial number 27C026929 and ammunition, and a Sig Sauer, Model P365, 9 millimeter handgun, bearing serial number 66A484210, said firearms and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 10

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C § 924(c)(1)(A)(i))

The Grand Jury further charges:

114. On or about May 18, 2022, in the Northern District of Ohio, Eastern Division, Defendant DESMOND SMITH, aka DEZ did possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, to wit: Possession with Intent to Distribute a Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), as charged in Counts 1, and 5 through 7, of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNTS 11-22

The Grand Jury further charges:

115. On or about the dates and approximate times listed below, in the Northern District of Ohio, and elsewhere, the Defendants listed below did knowingly and intentionally use a



communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21,  
United States Code, Section 846:

<b>Count</b>	<b>Defendants</b>	<b>Date</b>	<b>Time</b>
11	MARC MAHONEY, aka BEAR, aka MOOKIE MARQUIS GLENN, aka POLO	September 28, 2021	2:13 p.m.
12	DESMOND SMITH, aka DEZ SAMMY ABRAHAM	October 24, 2021	1:34 p.m.
13	DESMOND SMITH, aka DEZ DESHON KNOWLES	October 25, 2021	11:53 a.m.
14	DESHON KNOWLES	October 26, 2021	3:52 p.m.
15	SAMMY ABRAHAM	October 28, 2021	9:35 p.m.
16	MARC MAHONEY, aka BEAR, aka MOOKIE JEROME MCGINNIS, aka RONI	December 3, 2021	11:22 p.m.
17	MARC MAHONEY, aka BEAR, aka MOOKIE HOSEA LOCK	January 10, 2022	4:41 p.m.
18	HOSEA LOCK	January 10, 2022	4:55 p.m.
19	JEROME MCGINNIS, aka RONI	January 19, 2022	12:55 p.m.
20	MARQUIS GLENN, aka POLO	January 19, 2022	3:30 p.m. – 9:52 p.m.
21	JESSE BOJORQUEZ	January 19, 2022	7:40 a.m.
22	JESSE BOJORQUEZ	January 20, 2022	9:31 a.m.

All in violation of Title 21, United States Code, Section 843(b).

### FORFEITURE

The Grand Jury further charges:

116. The allegations of Counts 1 through 22, inclusive, are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to

Title 21, United States Code, Section 853 (drug offenses); Title 18, United States Code, Section 982(a)(1) (money laundering offense); Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) (interstate travel in aid of racketeering offense); and, Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) (firearms offenses). As a result of the foregoing offenses, Defendants MARC MAHONEY, aka BEAR, aka MOOKIE; HOSEA LOCK; JESSE BOJORQUEZ; JEROME MCGINNIS, aka RONI; MARQUIS GLENN, aka POLO; DESMOND SMITH, aka DEZ; DESHON KNOWLES and SAMMY ABRAHAM shall forfeit to the United States: (i) any and all property constituting - or derived from - any proceeds they obtained, directly or indirectly, as the result of the drug offenses; (ii) any and all of their property used - or intended to be used - in any manner or part, to commit or to facilitate the commission of the drug offenses; (iii) all property, real and personal, involved in the money laundering offense, and all property traceable to such property; (iv) all property, real and personal, which constitutes - or is derived from - proceeds traceable to the interstate travel in aid of racketeering offense; and, (v) any and all firearms and ammunition involved in or used in the commission of the firearms offenses; including, but not limited to, the following:

a.) \$2,399,585.00 U.S. Currency associated with MARC MAHONEY and JESSE BOJORQUEZ seized on January 20, 2022, at a self-storage facility located on Carnegie Avenue, Cleveland, Ohio.

b.) \$170,880.00 U.S. Currency seized on January 20, 2022, at a residence associated with MARC MAHONEY located on Pebblebrook Trail, North Royalton, Ohio.

c.) \$15,000.00 U.S. Currency associated with MARC MAHONEY seized on February 22, 2022, at a location in Conneaut, Ohio.

d.) Real property located at 5126 Theodore Street, Maple Heights, Cuyahoga County, Ohio; Permanent Parcel Number: 781-21-037. The record owner of the property is MARC MAHONEY.

e.) Real property located at 247 Main Street, Conneaut, Ashtabula County, Ohio; Permanent Parcel Number: 12-121-00-010-00. The record owner of the property is MARC MAHONEY.

f.) Real property located at 180 and 182 Park Avenue, Conneaut, Ashtabula County, Ohio; Permanent Parcel Numbers: 12-202-00-010-00 and 12-202-00-011-00. The record owner of the property is MARC MAHONEY.

g.) \$9,630.00 U.S. Currency seized on January 20, 2022, from the person of HOSEA LOCK at a location on East 140th Street, Cleveland, Ohio.

h.) \$3,528.00 U.S. Currency seized on May 18, 2022, from the person of DESMOND SMITH.

i.) Springfield Armory Hellcat, 9-millimeter handgun, serial number: BA213755, and ammunition, seized on May 18, 2022, from the person of DESMOND SMITH.

j.) Sig Sauer, Model P238, .380 handgun, serial number: 27C026929, and ammunition, seized on May 18, 2022, at a residence (apartment) associated with DESMOND SMITH located on Weymouth Circle, Westlake, Ohio.

k.) Sig Sauer, Model P365, 9-millimeter handgun, serial number: 66A484210, and

ammunition, seized on May 18, 2022, at a residence (apartment) associated with DESMOND SMITH located on Weymouth Circle, Westlake, Ohio.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.